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15 *Ultimate Fighting Championship and UFC*

16  
17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 Cung Le, Nathan Quarry, Jon Fitch, Brandon  
20 Vera, Luis Javier Vazquez, and Kyle Kingsbury,  
on behalf of themselves and all others similarly  
21 situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

25 Defendant.  
26

No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF STACEY K.  
GRIGSBY IN SUPPORT OF  
DEFENDANT ZUFFA, LLC'S REPLY  
IN SUPPORT OF ITS MOTION TO  
SEAL PLAINTIFFS' OPPOSITION  
TO ZUFFA'S MOTION FOR  
SUMMARY JUDGMENT (ECF NO.  
596)**

1 I, Stacey K. Grigsby, declare as follows:

2 1. I am a member in good standing of the bar of the District of Columbia and the bar of  
3 the State of New York. I am admitted *pro hac vice* to practice before this Court. I am a Partner in  
4 the law firm Boies Schiller Flexner LLP (“BSF”), counsel for Zuffa, LLC (“Zuffa”) in the above  
5 captioned action in the U.S. District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*, No.  
6 2:15-cv-01045-RFP-PAL.

7 2. I make this declaration in support of Zuffa’s Reply in Support of its Motion to Seal  
8 Plaintiffs’ Opposition to Zuffa’s Motion for Summary Judgment (ECF No. 596) (“Reply in Support  
9 of Motion to Seal”). Based on my personal experience, knowledge, and review of the files, records,  
10 and communications in this case, I have personal knowledge of the facts set forth in this Declaration  
11 and, if called to testify, could and would testify competently to those facts under oath.

12 3. Exhibit A to this declaration is a true and correct copy of an article written by Percy  
13 Crawford, titled *Nate Quarry Opens Up on UFC Anti-Trust Lawsuit; Explains How Dana White Is*  
14 *Starving Fighters*, from Fight Hype, dated October 5, 2016, and available at  
15 <http://www.fighthype.com/news/article26311.html>.

16 4. Exhibit B to this declaration is a true and correct copy of an article written by Paul  
17 Gift, titled *Antitrust Suit: Fighters File For Class Certification, UFC Wants ‘Junk Science’*  
18 *Excluded*, from Forbes.com, dated February 17, 2018, and available at  
19 [https://www.forbes.com/sites/paulgift/2018/02/17/ufc-antitrust-lawsuit-class-certification-junk-](https://www.forbes.com/sites/paulgift/2018/02/17/ufc-antitrust-lawsuit-class-certification-junk-science-excluded-mma-news/#6693f90b2c73)  
20 [science-excluded-mma-news/#6693f90b2c73](https://www.forbes.com/sites/paulgift/2018/02/17/ufc-antitrust-lawsuit-class-certification-junk-science-excluded-mma-news/#6693f90b2c73).

21 5. Exhibit C to this declaration is a true and correct copy of an article written by Paul  
22 Gift, titled *UFC Files For Summary Judgment In Class-Action Antitrust Lawsuit*, from Forbes.com,  
23 dated July 31, 2018, and available at [https://www.forbes.com/sites/paulgift/2018/07/31/ufc-files-](https://www.forbes.com/sites/paulgift/2018/07/31/ufc-files-summary-judgment-class-action-antitrust-lawsuit-mma-news/#3864cde75015)  
24 [summary-judgment-class-action-antitrust-lawsuit-mma-news/#3864cde75015](https://www.forbes.com/sites/paulgift/2018/07/31/ufc-files-summary-judgment-class-action-antitrust-lawsuit-mma-news/#3864cde75015).

25 6. Exhibit D to this declaration is a true and correct copy of an article written by Anton  
26 Tabuena, titled *UFC Lawsuit: Kidnapping, extortion? Manager gives bizarre reasoning to keep*  
27 *fighter pay private*, from Bloody Elbow, dated August 22, 2018, and available at  
28 <https://www.bloodyelbow.com/2018/8/22/17767496/ufc-lawsuit-kidnapping-extortion-manager->

1 [gives-bizarre-reasoning-to-keep-fighter-pay-private-mma.](#)

2 7. Exhibit E to this declaration is a true and correct copy of a tweet posted by John S.  
3 Nash (@heynottheface) on Twitter, dated September 21, 2018 at 8:52 PM, and available at  
4 <https://twitter.com/heynottheface/status/1043347265765531648>.

5 8. Exhibit F to this declaration is a true and correct copy of a tweet posted by Paul Gift  
6 (@MMAanalytics) on Twitter, dated September 24, 2018 at 10:42 AM, and available at  
7 <https://twitter.com/MMAanalytics/status/1044280866250285061>.

8 9. Exhibit G to this declaration is a true and correct copy of an article written by Harry  
9 Davies, titled *Dana White slams Scott Coker in lawsuit deposition: All his promotions have been*  
10 *'failures'*, from Bloody Elbow, dated October 1, 2018, and available at  
11 [https://www.bloodyelbow.com/2018/10/1/17917668/dana-white-bashes-scott-coker-promotions-](https://www.bloodyelbow.com/2018/10/1/17917668/dana-white-bashes-scott-coker-promotions-failures-ufc-lawsuit-deposition-mma-news)  
12 [failures-ufc-lawsuit-deposition-mma-news](https://www.bloodyelbow.com/2018/10/1/17917668/dana-white-bashes-scott-coker-promotions-failures-ufc-lawsuit-deposition-mma-news).

13 10. Exhibit H to this declaration is a true and correct copy of a tweet posted by John S.  
14 Nash (@heynottheface) on Twitter, dated October 3, 2018 at 5:12 PM, and available at  
15 <https://twitter.com/heynottheface/status/1047640574931623936>.

16 11. Exhibit I to this declaration is a true and correct copy of a tweet posted by John S.  
17 Nash (@heynottheface) on Twitter, dated October 3, 2018 at 5:22 PM, and available at  
18 <https://twitter.com/heynottheface/status/1047643135491207168>.

19 12. Exhibit J to this declaration is a true and correct copy of a tweet posted by Paul Gift  
20 (@MMAanalytics) on Twitter, dated October 3, 2018 at 7:08 PM, and available at  
21 <https://twitter.com/MMAanalytics/status/1047669638933311488>.

22 13. Exhibit K to this declaration is a true and correct copy of a tweet posted by John S.  
23 Nash (@heynottheface) on Twitter, dated October 4, 2018 at 10:13 AM, and available at  
24 <https://twitter.com/heynottheface/status/1047897628829147136>.

25 14. Exhibit L to this declaration is a true and correct copy of a news article written by  
26 Jack Encarnacao from *The Enterprise* newspaper of Brockton, Massachusetts with the headline  
27 "Legislation would create state regulations for mixed martial arts," dated July 22, 2009, and  
28 available at <https://www.enterpriseneews.com/article/20090722/NEWS/307229614>.

15. Exhibit M to this declaration is a true and correct copy of the “About Us” page from the website of the consulting firm Dewey Square Group, downloaded on October 22, 2018, which can be accessed at <http://www.deweysquare.com/about-us/>.

16. Exhibit N to this declaration is a true and correct copy of an excerpt of the August 3, 2017 deposition of Scott Coker taken in this action.

17. Exhibits 37, 62, 67, and 94 to this declaration are true and correct copies of the correspondingly numbered exhibits to the Declaration of Eric L. Cramer, Esq. (“Cramer Declaration”), ECF No. 596-2, filed concurrently with Plaintiffs’ Opposition and conditionally lodged under seal. Thus, for example, Exhibit 37 to this Declaration corresponds to the under seal version of Exhibit 37 to the Cramer Declaration with redactions applied.

18. Certain of the exhibits in the paragraph immediately above contain redactions that indicate information that Zuffa believes meets the compelling reasons standard and should be filed under seal. They are otherwise true and correct copies of the corresponding exhibits from the Cramer Declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct. Executed this 24th day of October, 2018 in Washington, DC.

/s/ Stacey K. Grigsby  
Stacey K. Grigsby